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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRANCIS WOOTERS,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION, LLC, BANK OF
AMERICA, N.A., MARLETTE FUNDING,
LLC, FIRST NATIONAL BANK OF
OMAHA, JPMORGAN CHASE BANK,
N.A., HSBC BANK USA, N.A., AND
SYNCHRONY FINANCIAL.

Defendants.

Case No. 2:22-CV-01691-CDS-BNW

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's Complaint (First Request):

On October 6, 2022, Plaintiff filed his Complaint [ECF No. 1]. The Summons to Defendants was issued on October 7, 2022 [ECF No. 3] and purportedly served on October 10, 2022. BANA has 21 days from when the summonses was served to file its response to the Complaint, which makes the current deadline October 31, 2022.

BANA's counsel is still investigating the allegations raised in Plaintiff's Complaint. Further, Plaintiff and BANA have discussed extending the deadline 30-days for BANA to respond

1 to the Complaint, in order to explore early resolution opportunities. On October 24, 2022, BANA
2 received approval of a 30-day extension to respond to the Complaint from Plaintiff's counsel,
3 which would make the response due November 30, 2022.

4 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline
5 for BANA to file its response to Plaintiff's Complaint to November 30, 2022. This is the first
6 request for extension of time for BANA to respond to Plaintiff's Complaint. The extension is
7 requested in good faith and is not for purposes of delay or prejudice to any other party.

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9 Dated this 26th day of October, 2022.

10 WRIGHT, FINLAY & ZAK, LLP

11 /s/ Jory C. Garabedian

12 Darren T. Brenner, Esq.

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15 Nevada Bar No. 10352

16 7785 W. Sahara Ave., Suite 200

17 Las Vegas, Nevada 89117

18 *Attorneys for Bank of America, N.A.*

19 **IT IS SO ORDERED:**

20 

21 UNITED STATES MAGISTRATE JUDGE

22 DATED: October 27, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 26, 2022, and pursuant to Fed. R. Civ. P. 5(b), I served via the CM/ECF electronic filing system a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to the parties below:

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/s/ Tonya Sessions
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